

TANASI LAW OFFICES
RICHARD E. TANASI, ESQ.
Nevada State Bar No. 9699
8716 Spanish Ridge Ave., Suite 105
Las Vegas, NV 89148
p. (702) 906-2411
f. (866) 299-5274
rtanasi@tanasilaw.com

Attorney for Christian Salvador Contreras

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHRISTIAN SALVADOR CONTRERAS,

Defendant.

Case No. 2:22-cr-00278-CDS-DJA-1

**STIPULATION FOR EXTENSION OF
TIME TO FILE REPLY TO
GOVERNMENT'S RESPONSE [42]
TO MOTION TO COMPEL [33]**

[Fourth Request]

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Richard Tanasi, appointed counsel for Defendant Christian Salvador Contreras, that the defendant's deadline to file his Reply to Government's Response [42] to Motion to Compel United States Marshals to Provide Adequate Medical Care [33], currently set for November 6, 2023 [51], be continued to at least seventy (70) days.

This Stipulation is entered into for the following reasons:

- 1) Counsel Richard Tanasi was appointed to the case on August 15, 2023.
 - 2) The government filed its Response on August 17, 2023.
 - 3) The parties are attempting to resolve the issue presented. To that end, the defense has engaged a dental expert, who requires a dental x-ray to evaluate the defendant's

medical/dental condition. The parties need time to explore the viability of an x-ray. As such, defense counsel requires additional time to file a Reply.

- 4) The defendant is incarcerated and does not object to this request.
 - 5) The parties agree to the extension.
 - 6) The additional time requested herein is not sought for purposes of delay.

DATED this 6th day of November 2023.

TANASI LAW OFFICES

JASON M. FRIERSON
United States Attorney

By /s/ Richard Tanasi
RICHARD TANASI, ESQ.
Counsel for Defendant

By /s/ Alisson Reese
ALLISON REESE
Assistant United States Attorney

111

111

111

111

111

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-cr-00278-CDS-DJA-1

Plaintiff,

V.

CHRISTIAN SALVADOR CONTRERAS,

ORDER

Defendant.

9 Based on the Stipulation of counsel and good cause appearing, IT IS THEREFORE
10 ORDERED that the Defendant's deadline to file its Reply to Defendant's [33] Motion to
11 Compel United States Marshals to Provide Adequate Medical Care, currently set for November
12 6, 2023, is reset to January 19, 2024

DATED this 7th day of November 2023


HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE